

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

SAMUEL WILLIAMS
3801 Webster Place
Fort Washington, MD 20744

Plaintiff

v.

RANDI RUTAN
20 Midsummer Drive
Old Bridge, NJ

Defendants

* * * * *

COMPLAINT
(Negligence - Jury Demand)

Comes now Plaintiff, Samuel Williams, by and through his attorneys, Michael J. Schreyer and Alpert Schreyer, LLC, and sues the Defendant, Randi Rutan, and avers and alleges the following:

COUNT I

Negligence – Defendant Rutan

1. That on or about April 14, 2015, at approximately 1:36 p.m., the Plaintiff, Samuel Williams, was the driver of a 2006 F-150, which was stopped after being rear ended while traveling South on Route 212. Mr. Williams and the driver of the other vehicle attempted to inspect the damage caused by the collision.

2. At that time, Defendant Rutan, was operating a 2014 Subaru Forrester headed South on Route 212. Defendant Rutan failed to stop for traffic stopped ahead of him and negligently rear-ended the vehicle stopped behind Mr. Williams vehicle.

3. As a result of the violent impact of the vehicles, Samuel Williams was

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suddenly and without warning, pinned between the two vehicles, sustaining severe injury.

4. It was then and there the responsibility of Defendant Rutan to keep his motor vehicle under control and to avoid colliding with the vehicle stopped ahead of him; to properly yield the right of way in order to avoid colliding with the vehicle stopped ahead of him; to keep a proper lookout in order not to collide with the vehicle stopped ahead of him; to control the speed of his vehicle so as not to collide with the vehicle stopped ahead of him; and to otherwise operate his vehicle with due care and caution so as to avoid colliding with the vehicle stopped ahead of him.

5. Notwithstanding the above-mentioned duties of Defendant Rutan, the said Defendant did operate his vehicle negligently, carelessly, recklessly and in violation of the traffic rules then and there in force in the State of Maryland and did violently collide with the vehicle in front of him, pinning the Plaintiff in between two vehicles.

6. As a result of the above said collision, the Plaintiff, Samuel Williams, was violently struck, sustaining severe, painful and permanent injuries to his body as well as severe and protracted shock to his nervous system, all of which caused him, and will continue to cause him in the future, great pain and mental anguish.

7. As a further result of the aforementioned injury sustained by the Plaintiff, Samuel Williams, the said Plaintiff, has sustained extensive pain, suffering and emotional distress and may continue to endure extensive pain and suffering as well as emotional distress in the future.

8. The Plaintiff, Samuel Williams, is required, and may well be required in the future, to incur medical treatment and medical expenses for the aforesaid injuries.

9. In addition, as a result of the aforementioned injuries, the Plaintiff, Samuel

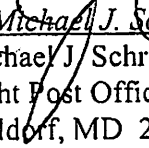
Williams, lost a considerable amount of time from his employment and may well lose time in the future from employment as a result of the injuries sustained in this accident.

10. All of the aforementioned injuries and expenses were the result of Defendant Rutan's aforesaid negligence, which were sustained without any fault or negligence on the part of the Plaintiff, Samuel Williams.

WHEREFORE, the Plaintiff, Samuel Williams, claims compensatory damages in the amount in excess of Seventy Five Thousand Dollars and 00/100 (\$75,000.00), plus interest and costs against the Defendant, Randi Rutan.

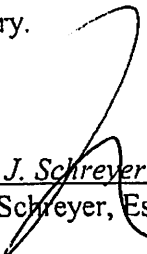
Respectfully submitted,

ALPERT SCHREYER, LLC


/s/ Michael J. Schreyer
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Attorney for Plaintiff

JURY DEMAND

The Plaintiffs request that this action be tried before a jury.


/s/ Michael J. Schreyer
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